

Title VI Plan

County of Juneau

Adopted on: (insert date)

3-17-14

Adopted by: Juneau County Committee on Aging and Disability

Revised on: (insert date)

This policy is hereby adopted and signed by:

Juneau County Committee on Aging and Disability

Executive Name/Title: Tom Bronnacker - Chairman - Aging

Executive Signature: Tom Bronnacker

Title VI Plan Elements
1. Policy Statement, Authorities and Citations
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4. Complaint Form
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<i>Note: Additional materials will be attached, if required.</i>

Policy Statement, Authorities and Citations

The **County of Juneau** assures that it will comply with the following laws and regulations so that no person in the United States will be denied the benefits of, or otherwise be subjected to discrimination in any U.S. DOT or FTA funded program or activity particularly in the level and quality of transportation services and transportation-related benefits on the basis of race, color, national origin, religion, sex, disability, or age:

- ✓ Federal transit laws, specifically 49 U.S.C. 5332, as amended by MAP-21 (prohibiting discrimination on the basis of race, color, religion, national origin, sex, disability, or age, and in employment or business opportunity),
- ✓ Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000d,
- ✓ The Rehabilitation Act of 1973, as amended, 29 U.S.C. 794, *et seq.*,
- ✓ The Americans with Disabilities Act of 1990, as amended, 42 U.S.C. 12101 *et seq.*,
- ✓ U.S. DOT regulations, "Nondiscrimination in Federally-Assisted Programs of the Department of Transportation-Effectuation of Title VI of the Civil Rights Act of 1964," 49 CFR part 21,
- ✓ U.S. DOT regulations, specifically 49 CFR parts 27, 37, 38, and 39, and
- ✓ Any other applicable Federal statutes that may be signed into law or Federal regulations that may be promulgated,

As required by 49 CFR 21.7, the **County of Juneau** will:

1. Comply with Federal guidance implementing Federal nondiscrimination laws and regulations, except to the extent FTA determines otherwise in writing,
2. Comply with 49 U.S.C. 5332, as amended by MAP-21, 42 U.S.C. 2000d, and 49 CFR Part 21 in the manner it conducts each Project, undertakes property acquisitions, and operates its Project facilities, including: its entire facilities and its facilities operated in connection with its Project.
3. Promptly take the necessary actions to carry out the laws and regulations, including: notifying the public that discrimination complaints about transportation-related services or benefits may be filed with U.S. DOT or FTA, and submitting information about its compliance with these provisions to U.S. DOT or FTA upon their request,
4. Ensure that if it transfers FTA funded real property, structures, or improvements to another party, any deeds and instruments recording that transfer will contain a covenant running with the land assuring nondiscrimination: (1) while the property is used for the purpose that the Federal funding is extended, and (2) while the property is used for another purpose involving the provision of similar services or benefits,
5. Make any changes in its Title VI implementing procedures as U.S. DOT or FTA may request to comply with Title VI of the Civil Rights Act, 42 U.S.C. 2000d, U.S. DOT regulations, 49 CFR part 21, and Federal transit laws, 49 U.S.C. 5332, as amended by MAP-21,
6. Comply with Federal guidance issued to implement Federal nondiscrimination requirements, except as FTA determines otherwise in writing,
7. Extend the requirements of 49 U.S.C. 5332, as amended by MAP-21, 42 U.S.C. 2000d, and 49 CFR part 21 to each Third Party Participant, including: (1) Any Subrecipient, (2) Any Transferee, (3) Any Third Party Contractor or Subcontractor at any tier, (4) Any Successor in Interest, (5) Any Lessee, or (6) Any other Third Party Participant in its Project,
8. Include adequate provisions to extend the requirements of 49 U.S.C. 5332, as amended by MAP-21, 42 U.S.C. 2000d, and 49 CFR part 21 to each third party agreement, including: (1) Each subagreement, (2) Each property transfer agreement, (3) Each third party contract or subcontract at any tier, (4) Each lease, or (5) Each participation agreement, and

As required by U.S. DOT regulations, "Nondiscrimination on the Basis of Handicap in Programs and Activities Receiving or Benefiting from Federal Financial Assistance," 49 CFR part 27, specifically 49 CFR 27.9, and consistent with 49 U.S.C. 5307(c)(1)(D)(iii), as amended by MAP-21, the **County of Juneau** assures that it will:

1. Comply with the following prohibitions against discrimination on the basis of disability, which are a condition of approval or extension of any FTA funding awarded to: (1) Construct any facility, (2) Obtain any rolling stock or other equipment, (3) Undertake studies, (4) Conduct research, or (5) Participate in or obtain any benefit from any FTA administered program, and
2. Ensure any program or activity receiving or benefiting from Federal funding that U.S. DOT administers, no otherwise qualified people with a disability will, because of their disability, be: (1) Excluded from participation, (2) Denied benefits, or (3) Otherwise subjected to discrimination.

The United States has a right to seek judicial enforcement of any matter arising under Title VI of the Civil Rights Act, 42 U.S.C. 2000d, U.S. DOT regulations, 49 CFR part 2.

The **County of Juneau** Title VI plan will remain in effect as long as: (1) Federal funding is extended to its project and/or services, (2) Project property is used for a purpose for which the Federal funding is extended, (3) Project property is used for a purpose involving the provision of similar services or benefits, or (4) Ownership or possession is retained of its Project property.

TITLE VI Notice to the Public

Notifying the Public of Rights Under Title VI

THE COUNTY OF JUNEAU

- ✓ The **County of Juneau, Juneau County Aging Unit** operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the **County of Juneau, Juneau County Aging Unit**.
- ✓ For more information on the **County of Juneau, Juneau County Aging Unit** civil rights program, and the procedures to file a complaint, contact 608-847-9371, 877-794-2372, or (TTY 800-283-9877); email hrendall@co.juneau.wi.us ; or visit our administrative office at 220 E. LaCrosse St., Mauston, WI 53948 For more information, visit www.adrceagle.org
- ✓ A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

Title VI Complaint Procedure

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the **County of Juneau, Juneau County Aging Unit** may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. The **County of Juneau, Juneau County Aging Unit** investigates complaints received no more than 180 days after the alleged incident. The **County of Juneau, Juneau County Aging Unit** will process complaints that are complete.

1. Once the complaint is received, the **County of Juneau, Juneau County Aging Unit** will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office within five (5) calendar days. The complaint will be logged into the records of the Title VI Coordinator, and the basis for the allegation identified including race, color, national origin, handicap/disability, age, or sex.

2. The **County of Juneau, Juneau County Aging Unit** has 60 days to investigate the complaint. If more information is needed to resolve the case, the county may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the investigator assigned to the case.

If the investigator is not contacted by the complainant or does not receive the additional information within 20 business days, the county can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

The report shall include a narrative description of the incident, identification of persons interviewed, findings and recommendations for disposition.

3. The recommendation shall be reviewed with the Juneau County Corporation Counsel's office. The Corporation Counsel may discuss the report and recommendations with the Coordinator and other appropriate Juneau County Aging Unit staff. The report will be modified as needed and made final for its release to the parties.

4. Once the investigative report is finalized a briefing will be held with each party within 15 days. Both the complainant and the respondent shall receive a copy of the investigative report during the briefings and will be notified of their respective appeal rights.

5. After the investigator reviews the complaint, she/he will issue one of two (2) letters to the complainant: a closure letter or a letter of finding (LOF).

- ✓ A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- ✓ A letter of finding (LOF) summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur.

6. If the complainant wishes to appeal the decision, she/he has 180 days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

If information is needed in another language, the complainant may contact the Juneau County Aging Unit at 608-847-9371, toll free at 877-794-2372, or (TTY 800-283-9877).

7. An annual Log of Complaints will be maintained by the Juneau County Aging Unit. The Log of Complaints will contain the following information for each complaint filed:

1. The name and address of the person filing the complaint
2. The date of the complaint
3. The basis of the complaint
4. The disposition of the complaint

Title VI Complaint Form

The County of Juneau, Juneau County Aging Unit Title VI Complaint Procedure is made available in the following locations: *(check all that apply)*

- ☐ x Agency website, either as a reference in the Notice to Public or in its entirety
☐ x Hard copy in the central office
☐ Available in appropriate languages for LEP populations, meeting the Safe Harbor Threshold.
☐ Other, _____

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party:				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
Section III:				
I believe the discrimination I experienced was based on (check all that apply):				
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin				
Date of Alleged Discrimination (Month, Day, Year): _____				
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.				
_____ _____				
Section IV:				
Have you previously filed a Title VI complaint with this agency?			Yes	No

Section V		
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?		
<input type="checkbox"/> Yes <input type="checkbox"/> No		
If yes, check all that apply:		
<input type="checkbox"/> Federal Agency: _____		
<input type="checkbox"/> Federal Court _____		<input type="checkbox"/> State Agency _____
<input type="checkbox"/> State Court _____		<input type="checkbox"/> Local Agency _____
Please provide information about a contact person at the agency/court where the complaint was filed.		
Name: _____		
Title: _____		
Agency: _____		
Address: _____		
Telephone: _____		
Section VI		
Name of agency complaint is against: _____		
Contact person: _____		
Title: _____		
Telephone number: _____		

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below

Signature	Date

Please submit this form in person at the address below, or mail this form to:

County of Juneau, Juneau County Aging Unit, Title VI Coordinator
 220 E. LaCrosse Street
 Mauston, WI 53948

List of Transit Related Title VI Investigations, Complaints and Lawsuits

Subrecipient: Juneau County Aging Unit		
Contact Person: Heidi Randall	Signature:	Date: 2-20- 14

Check One:

☒ There have been no investigations, complaint and/or lawsuits filed against us during the report period.

☐ There have been investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*

	Date Month Day, Year	Complainant Name/Address City, State, Zip	Summary (for Department or Council for public review of complaint/claim)	Status	Additional Detail
Investigations					
1.					
2.					
Complaints					
1.					
2.					
Lawsuits					
1.					
2.					

Public Participation Plan

Subrecipient: Juneau County Aging Unit		
Contact Person: Heidi Randall	Signature:	Date: 2-20-14

Strategies and Desired Outcomes

To promote inclusive public participation, the **County of Juneau, Juneau County Aging Unit** will use its resources available to employ the following strategies, as appropriate:

- ✓ Provide for early, frequent and continuous engagement by the public.
- ✓ Expand traditional outreach methods. Think outside the box: go to hair salons, barbershops, street fairs, faith-based institutions, libraries, etc.
- ✓ Select accessible and varied meeting locations and times
- ✓ Employ different meeting sizes and formats
- ✓ Provide childcare and food during meetings, if possible.
- ✓ Use social media in addition to other resources as a way to gain public involvement
- ✓ Use radio, television or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations may also include audio programming available on podcasts.

Documented Public Outreach

The direct public outreach and involvement activities conducted by the **County of Juneau, Juneau County Aging Unit** are summarized in the table below. Efforts include *meetings, surveys, focus groups, etc.*

Information pertinent to each event and/or activity will be provided to WisDOT upon request. Examples include copies of: meeting announcements, agendas, posters, attendee list, etc.

Date		Activity		Description	
Date	Contact Person	Activity	Description	Date	Attendees
8-22-13	Heidi Randall	Locally Developed Transportation Plan Meeting with North Central Planning Commission	8-1-13 Public Notice, posters, mailing, meeting agendas and minutes	Meeting/focus group with planning commission and local transportation providers in Juneau and adjacent Monroe County	The 2013 Coordinated Transportation Plan was developed with local transportation partners with goals and objectives for improved access to programs. 7 persons attended
11-26-13	Heidi Randall	Public hearing for 85.21 plan	11-7-13 Public notice, mailing, meeting agendas and minutes	Public hearing held in Mauston senior dining center	Public hearing minutes were developed for inclusion in 2014 85.21 Transportation Application. 8 persons attended

12-3-13	Heidi Randall, Jennifer Brereton	Senior Bus Show and Tell Day	11-4-13 Posters, meeting notices, media releases	Took senior bus to 9 different senior housing complexes in 7 Juneau County communities and showcased bus to seniors to solicit new riders	This show and tell day was an excellent method of showing the bus to potential riders, publicizing the bus schedule, and getting new riders for the bus program. 44 people attended

¹ Include additional information such as: the size, location, meeting format, number of attendees, etc. as well as the scope of the distribution method (i.e. posters were placed in all shopping centers in the affected area).

Language Assistance Plan

Item 1—Results of the Four Factor Analysis

Four Factor Analysis

#1 Demography

The Juneau County Aging Unit provides a volunteer driver escort program and senior van program under Wisconsin Statutes s85.21 and a senior bus service under a Section 5310 federal grant. Services are provided within Juneau County and outside its borders for shopping, medical, and other business trips. The 2010 Census reports a county population of 26,631. The American Community Survey (ACS) reports a population estimate of 26,701. The County of Juneau is below the Safe Harbor threshold. The largest LEP (Limited English Proficiency) population is other Indo-European Languages which represents 527 people, or .019 of the total county population and the second is Spanish which represents 396 people, or .015 of the total county population.

#2 Frequency

The Juneau County Aging Unit provides rides to elderly and disabled persons in and out of Juneau County under its three transportation programs. A total of 243 different individuals were transported during calendar year 2013. Many of them took multiple trips of varying types. There were 7275 trips taken by those persons during the past year.

Rides are provided on a demand response basis for the senior van and volunteer escort driver program and with scheduled destinations for senior bus trips. All modes of transportation are offered in and out of county for county residents. Trips are arranged through the Juneau County Aging Unit Transportation Coordinator.

The Transportation Coordinator will arrange the services of the contracted language interpreter service appropriate for the LEP person if they have difficulties understanding spoken English. This includes both visual and spoken language interpretation.

#3 Importance

The Juneau County Aging Unit understands that an LEP person who has language barriers has difficulty arranging for services important to their health and wellbeing. This can include day-to-day services as well as emergency services that they may need.

include staff recognition of potential needs of LEP persons that may access our transportation programs. Assistance to the LEP person is tailored to their specific needs and thus services are arranged with those considerations in mind. Due to the limited percentage of LEP residents of Juneau County this has not been a high demand need. However, we respect and understand our obligation to this population for equal access to transportation.

The Juneau County Aging Unit's assessment of programs, services, and activities most important to LEP persons include various community resources that they may currently use and desire to access through its transportation programs.

#4 Resources and Costs

The Juneau County Aging Unit has a contract with the Sign Language Group for hearing impaired persons, works with the Wisconsin Relay Service, and the Language Line Services in working with the disabled and LEP population. Services are paid for on an as needed basis through the annual budget. Coordination of service with other community resources is conducted to provide access to programs for LEP persons common to those we serve as agency service providers.

Item #2—Description of how Language Assistance Services are Provided, by Language

Language assistance services are provided on an as needed basis by contacting the Sign Language Group, Wisconsin Relay Service, or the Language Line Service, which is dependent on the persons needs. Staff determines the best method of assistance and then contacts the appropriate service by phone to arrange the interpreter.

Item #3—Description of how LEP Persons are informed of the Availability of Language Assistance Service

The Juneau County Aging Unit informs the LEP population of its language assistance service through posters hung in the waiting room of the office. It also determines need through its one- on- one interaction with LEP persons, their advocates, and other service providers who have made referrals to the Aging Unit on their behalf. Language Assistance is then established at the onset of services in order for the Aging Unit to best serve its LEP population.

Outreach will be conducted at local food pantries, community dinners, schools, libraries, churches, and other locations where LEP populations frequent.

Item #4—Description of how the Language Assistance Plan is Monitored and Updated

The plan is monitored on an annual basis through review of expenditures incurred for language interpretation services. Case management services are provided by office staff and are recorded in the state database as they occur, and once services are closed for a client. Collateral contacts with outside agencies are made and noted in case files and in the database. Reports can be generated from the database to tally the numbers of LEP persons served, and the specific services they have accessed through the Juneau County Aging Unit.

Item #5—Description of how Employees are Trained to Provide Language Assistance to LEP Persons

New and existing staff persons receive an orientation to standard LEP assistance services available to the Aging Unit's clientele. Written information is made available with contact names and numbers. The Director provides support and guidance to staff members during the process of connecting LEP persons to services. The Director troubleshoots any problems staff may have in working with language assistance providers and coordinates refresher training for staff with those providers.

Minority Representation Information

A. Minority Representation Table

The table below depicts the **County of Juneau, Juneau County Aging Unit's** Committee related to transit: The Committee on Aging and Disability. The demographic data below indicates the participation of minorities on the committee.

Body	Caucasian	Hispanic	African American	Asian American	Native American
Committee on Aging & Disability	100%	0	0	0	0

A. Efforts to Encourage Minority Participation

The **County of Juneau, Juneau County Aging Unit** recognizes that diverse representation on its committee results in comprehensive policy development and service delivery. Historically the committee has had challenges to meet this goal as intended. The county does not meet the Safe Harbor criteria for minority populations of >5% or 1000 persons.

The **County of Juneau, Juneau County Aging Unit** will make a concerted effort to recruit members of minorities on its committee that reflect the demographics of the county. At present new committee members are recruited through local print and radio media. Applications are completed by interested persons to determine their level of interest and past work history or experience working with older adults and persons with disabilities. Their participation and selection to the committee is made and then confirmed by resolution by the Juneau County Board of Supervisors. The **Juneau County Aging Unit** will continue to reach out to community, ethnic and faith-based organizations to connect with all populations.

Minority Representation Data Collection Form

Juneau County Committee on Aging and Disability

Date:

Dear Member:

As the **County of Juneau, Juneau County Aging Unit** is a recipient of federal funds, we are required under Title VI of the Civil Rights statute to determine the race/ethnic make-up of any non-elected boards, committees, councils, etc.

Data from this section is used for statistical and reporting purposes. The information may be subject to disclosure under federal or state law or rule.

Anti-Discrimination Notice

It is unlawful for the **County of Juneau, Juneau County Aging Unit** to fail or refuse to provide services, access to services or activities, or otherwise discriminate against an individual because of an individual's race, color, religion, sex, national origin, disability or veteran status.

As a committee under the jurisdiction of the **County of Juneau**, we invite committee members to voluntarily self-identify their race/ethnicity in order for us to comply with FTA Title VI regulations. This information will be used according to the provisions of applicable federal and state laws, executive orders and regulations, including those requiring the information to be summarized and reported to the federal government for civil rights enforcement purposes.

Race/Ethnicity

If you choose to self-identify, please mark the **one box** describing the race/ethnicity category with which you primarily identify:

-----*Asian or Pacific Islander*: All persons having origins in any of the people of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands. This area includes, for example, China, Japan, Korea, the Philippine Islands and Samoa.

-----*Black and/or African American* (not of Hispanic origin): All persons having origins in any of the Black racial groups of Africa.

-----*Hispanic*: All persons of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.

-----*American Indian or Alaskan Native*: All persons having origins in any of the original peoples of North America, and who maintain cultural identification through tribal affiliation or community recognition.

-----*Caucasian* (not of Hispanic origin): All persons having origins in any of the original peoples of Europe, North Africa or the Middle East.